

EXHIBIT 3

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

All Cases

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

Declaration of David Teague

I, David Teague, make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

1. I am employed by Rite Aid Hdqtrs. Corp. as the Vice President of Digital Platforms and Innovation. I have been in this role since approximately September 2019. I have personal knowledge of the facts contained herein or have been provided these facts in connection with the usual course of my employment.

2. I understand based on information provided to me the following statistics regarding Rite Aid pharmacies. Rite Aid currently operates 27 stores in Cuyahoga and Summit counties in Ohio. There are 208 Rite Aid stores in the state of Ohio, and 2,443 Rite Aid stores nationwide. In 2016, Rite Aid operated 33 stores in Cuyahoga and Summit counties, over 220 stores in Ohio, and over 4,500 stores nationwide. In 2009, Rite Aid operated 38 stores in Cuyahoga and Summit counties, over 240 stores in Ohio, and over 4,900 stores nationwide.

3. I also understand based on information provided to me that Rite Aid has filled more than 4.7 million prescriptions at the Rite Aid stores that operated in Cuyahoga and Summit counties since September 2016.

4. I understand based on information provided to me that Rite Aid has filled more than 3 billion prescriptions nationwide since 2009 (which is as far back as Rite Aid's dispensing data is available in its data warehouse), and more than 11.4 million prescriptions in Cuyahoga and Summit counties since 2009.

5. Rite Aid's dispensing data includes private health information, ranging from the prescription medications a patient has taken (often over a lengthy period of time), dosage information, diagnostic information, information about the patient's address, and other sensitive information.

6. Using the data fields requested by Plaintiffs for collection, my team estimates that it will take roughly four to six weeks to collect and produce anonymized dispensing data going back 3 years for Cuyahoga and Summit counties. This data would have to be collected from multiple tables for each prescription and each of those tables would have to be cross-referenced by Rite Aid's systems in order to compile the complete dataset. Any request for additional fields may take additional time beyond this estimate.

7. My team estimates that it would take roughly three to five months to collect and produce anonymized nationwide dispensing data going back 10 years. That estimate is based principally on the time it would take to create and test the code required to pull the data, the different tables from which the data would have to be collected, and the amount of data.

8. We would not only require the assistance of an outside vendor in this process, but we estimate that, internally, we would need to devote one full-time employee to the task of extracting the data for 10-hour days for several months.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: December 19, 2019


David Teague